

## FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

November 10, 2010

Timothy Crawford, Treasurer Sarah PAC P.O. Box 7711 Arlington, VA 22207

**Response Due Date: December 15, 2010** 

Identification Number: C00458588

Reference:

October Quarterly Report (7/1/10 - 9/30/10)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of Failure to adequately respond by the your federal election campaign finances. response date noted above could result in an audit or enforcement action. Additional information is needed for the following 6 items:

- 1. The totals listed on Lines 6(c), 11(a)(i), 11(a)(ii), 11(a)(iii), 11(d), 19, and 20, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This-Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.
- 2. Your calculations for Line 8 appear to be incorrect. Cash-on-hand at the close of the current reporting period should always equal the closing calendar year-to-date cash-on-hand amount. Please provide the corrected total on the Summary Page.
- 3. Your report discloses an apparent uneashed contribution from a federal candidate totaling \$3,500 on Schedule A supporting Line 16 of the Detailed Summary Page. If the check written by your committee was not cashed, you should itemize the voided check on Schedule B supporting Line 23 as a negative entry. Line 16 should only be used if the recipient committee cashed your check and wrote a refund on its account. Please amend your report to correct this discrepancy or provide clarification regarding this transaction.

- 4. Schedule A supporting Lines 15 and 17 of your report discloses an offset to an operating expenditure(s) totaling \$3,862.90 from "Pie-Sky LLC"; however, your report(s) does not appear to disclose a disbursement to this entity. Please provide clarifying information regarding this activity and amend your report(s) if necessary.
- 5. Please clarify all expenditures made for "Fundraising Consulting" and "Internet and credit card fundraising" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B or E supporting Lines 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1
- 6. Schedule B discloses an expenditure(s) for "BRE Postage," "clerical consulting, postage, office supplies," "Direct Mail, Printing, List Rental," "Direct Mail, Printing, Postage, Creative," "Direct mail fundraising," "media, strategic consulting," "Media and Political Consulting," "photography," "Photography Services," "postage," "Postage," "Printing," "Printing and Stationary," and "Video Filming and Production." portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any

questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1159.

Sincerely,

Allen Norfleet

Senior Campaign Finance Analyst

Reports Analysis Division

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